



March 27, 2025

Sam Amini
Jeffrey T. Baron
Richard B. Brown
Robert B. Brown
Isaac M. Dana
Jennifer Devenuti
Paul Duer
Gerard Ferrara++
Christopher Fingerhut
Eric Flores
James G. Flynn
Anthony E. Graziani
Gilbert J. Hardy
Erin E. Hennessy
Ashley A. Hughes
Timothy F.X. Jones
Tara M. Kennedy
William Q. Kleinfelder
Malachy Lyons
Charles S. Mailloux
Emelybel Vasquez Molina
Annmarie C. Montano
Colin F. Morrissey
Dawn A. Munro
Kevin J. Philbin
Deborah S. Reed
Lester C. Rodriques
Laurine M. Rubin*
Francis J. Scahill
Rosario G. Sicuranza
Jesse M. Squier**
David J. Tetlak
Keri A. Wehrheim
Kelly E. Wright

OF COUNSEL:
Brian M. Hussey
Louis A. Pratt

ALSO ADMITTED
++ New Jersey
* Colorado
** Arizona

Via ECF

Hon. Nusrat J. Choudhury, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1040
Central Islip, NY 11722-4438

Re: Deo, et al. v. Baron, et al.,
Case No.: 2: 24-cv-6903 (NJC)
Our Claim No. [UT10440769](#)

Dear Judge Choudhury:

Please accept this request for clarification of the answer deadline for our clients in the above-referenced matter. We represent defendants Ronald Baron, Joshua Aaronson, Jory Baron, Marcello Sciarrino, Daniel O'Sullivan, Brian Chabrier, Wendy Kwun, Iris Baron, Raymond Phelan, Asad Khan, Estate Of David Baron, and Island Auto Group of New York LLC a/k/a Island Auto Group of NY LLC a/k/a Island Auto Group (collectively the "Island Auto defendants"). This request for clarification is also joined by counsel for defendant Baron Nissan Inc. d/b/a Baron Nissan.

We respectfully request herein that the Court confirm that the deadline for the Island Auto defendants to answer plaintiff's amended complaint is stayed pending the resolution of the remand issue, which is currently being litigated before this Court. We note the prior Order of this Court dated March 8, 2025 stating:

The briefing schedule set forth in the November 20, 2024 Order is stayed pending resolution of the question of this Court's jurisdiction over this action.

On November 22, 2024, however, Magistrate Wicks ordered our clients, the Island Auto defendants to answer or otherwise respond to the complaint or any amended complaint by April 1, 2025.

d 516.294.5200 *f* 516.873.6229

1065 Stewart Avenue, Suite 210, Bethpage, NY 11714
[scahillpc.com](#)

It would seem to stand to reason that our clients' time to answer or otherwise respond would *or should* also be stayed along with the rest of the November 20, 2024 briefing schedule mentioned in the aforesaid March 8, 2025 order.

If we have misunderstood, and if our clients' answer is indeed still due by April 1, 2025, we ask that same be clarified, so that we can protect our clients' interests accordingly.

Thank you very much for your assistance and understanding herein.

Sincerely yours,

SCAHILL LAW GROUP P.C.

Jeffrey Baron

JEFFREY T. BARON, ESQ.

cc All parties via ECF